

### III. REMARKS

1. Claims 1-16 are pending. Claims 1, 6 and 11 are amended.
2. Claims 1, 2, 4-7, 9-12 and 14-16 are patentable under 35 U.S.C. 102(e) over Wu, U.S. Pub. No. 2006/0165465. Claim 1 recites that the bendable elastomeric keymat comprises elastic properties that force the lips into the plurality of indentations on the cover to attach the edges of the keymat to the cover. This feature is not disclosed or suggested in Wu.

While the key module (12) of Wu has flexible side tabs (25) there is clearly no disclosure in Wu that the key module is an "elastomeric keymat" having "elastic properties that force the lips into the plurality of indentations on the cover to attach the edges of the keymat to the cover" as recited in Applicant's claim 1. The key module (12) of Wu is constructed of several components (Figs. 9, 15 and 16). In one embodiment of Wu the key module (12) has keycaps (15), keycap holding mechanisms (14) and a keycap frame (Fig. 9). In another embodiment of Wu the key module (12) has keycaps (15a, 15b), keycap actuating mechanism (16a, 16b) and a keycap holding plate (14a, 14b). There is no disclosure that the keycap frame (14) or keycap holding plates (14a, 14b) are elastomeric. At best Wu discloses that the keycap actuating mechanism (16a, 16b) includes a rubber sheet/dome used in conjunction with a spring. There is absolutely no disclosure in Wu that the rubber sheet/dome has "elastic properties that force the lips into the plurality of indentations on the cover to attach the edges of the keymat to the cover". Rather, in Wu all the keycap actuating mechanism (16a, 16b) does is provide the right feel to the user and reposition the key (15) after it has been released (Para. [0073]).

The flexible side tabs (25) of Wu are attached to the frame of the key module (12) as can clearly be seen in Figure 3 in the section view. There is simply no disclosure in Wu that the frame of the key module (12) or the flexible side tabs (25) are "elastomeric".

Thus, Wu cannot disclose or suggest a “bendable elastomeric keymat” that “comprises elastic properties that force the lips into the plurality of indentations on the cover to attach the edges of the keymat to the cover” as recited in Applicant’s claim 1. Therefore, claim 1 is patentable over Wu.

Further, Applicant maintains that the keycap module (12) in Wu is rigid and not bendable as evidenced by the methods of attachment disclosed in Wu. The Examiner argues that “plastic has an elastic property and therefore is bendable” however there is no disclosure in Wu that the key module itself is bendable. All that is disclosed in Wu are flexible tabs (25) attached to the keycap module (12). As can be seen in Figure 9 of Wu the keycap frame has a base portion and a rim portion extending up from the edges of the base portion. The rim portion would tend to prevent any flexing or bending of the keycap module as this rim would act stiffening member. Further examples that the keycap module (12) is not bendable includes the fact that the tabs (25) are resilient. If the keycap module (12) were bendable as suggested there would be no need for the tabs (25) to be resilient. Further, evidence of the rigidity of the key module (11) can be seen in Figures 5, 11, 13 and 14 of Wu. With respect to Figure 5, separate key modules (212-215) are attached to individual portions of a foldable base module. It is clear from Figure 5 that each sub-module (212-215) is rigid as the sub-modules do not span the folds and remain straight when the base module is folded. With respect to Figure 11, the rigid key module sections (712a, 712b) are screwed to the base module (711). As can be seen in Figure 13 of Wu, the key module (912) is held in place by a tab (925) and slider (927) arrangement. In Figure 14, the key module (1012) is attached to the base module (1011) by tabs (1025) and hooks (1026) that are slidingly engaged. All of these methods of attachment between the key module and base module are configured so that the key portion of the key module is not bent when installed or affixed to the base module. Thus, claim 1 not anticipated by Wu for this additional reason.

Applicant's claim 1 further recites that the cover "includes a plurality of apertures through which the plurality of pressure transmitters pass to activate the plurality of key switches". Paragraph [0071] of Wu does not disclose this feature. Paragraph [0071] of Wu merely recites that "[f]rom top to bottom, the components of the keyboard 10 will include a top key-holding plate 14 for supporting multiple keycaps 15 in their free vertical movements within a limit provided by a retaining means not shown, a key-actuating mechanism 16 in a resilient sheet formed with upward domes for biasing the keycaps 15 at a raised level, the electrical circuitry membrane/PCB 13, a bottom holding plate 17, upper and lower enclosure halves 18 and 19, which allow the key-actuating mechanism 16 to be connected to the keycaps 15 of the key module 12 mechanically but not permanently as shown in FIGS. 9, 15 and 16" and nothing more. As can be seen in Figure 9 the pressure transmitters of the keycaps (15) do not pass through the holes in the holding plate (23) as the holding plate (23) sits on top of the key actuating mechanism (16) so that the rubber domes (7) (see Fig. 3) of the key actuating mechanism protrude through the holes in the holding plate (23). Similarly, Figures 15 and 16 also show electric circuitry membrane/PCB (13a, 13b) protruding through the holding plate such that the pressure transmitters of the keycaps (15a, 15b) do not pass through the holes in the holding plate. Thus, claim 1 is patentable for the additional reason that Wu does not disclose or suggest the cover "includes a plurality of apertures through which the plurality of pressure transmitters pass to activate the plurality of key switches".

Claims 6 and 11 are patentable over Wu for reasons that are substantially similar to those described above with respect to claim 1. Claims 2, 4, 5, 7, 9, 10, 12 and 14-16 are patentable at least by reason of their respective dependencies.

Claim 16 recites that the keymat is moulded in one piece. Figures 3 and 8 of Wu do not show the key module (12) as being moulded in one piece. Rather, as described above, the key module (12) in Wu includes at least a frame and a key cap (15) for each and every single key on the key module (12) (See e.g. Fig. 9). Nowhere does Wu disclose

the key module (12) is moulded in one piece. Thus, claim 16 is patentable for this additional reason.

3. Claims 3, 8 and 13 are patentable under 35 U.S.C. 103(a) over Wu and Kfoury et al., U.S. Pub. No. 2003/0119543 ("Kfoury"). Claims 3, 8 and 13 depend from claims 1, 6 and 11 which are patentable over Wu for the reasons described above. It is submitted that because Wu does not disclose or suggest all the features of claims 1, 6 and 11, that the combination of Wu and Kfoury cannot as well. Thus, claims 3, 8 and 13 are patentable at least by reason of their respective dependencies.

Moreover, the combination of Wu and Kfoury does not disclose or suggest that said guiding pieces are arranged in direct connection to one or more of said plurality of lips as recited in Applicant's claim 3. The Examiner acknowledges that Wu does not disclose this feature and argues that Wu discloses "guiding pieces" (114) and "guiding recesses" (113) (Figs. 4 and 8; Para. [0079] and [0084]). It is asserted that Wu discloses the features of claim 8 in Figures 4 and 5 and at paragraphs [0032]-[0033].

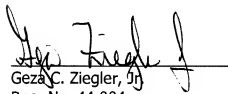
Figures 4 and 5 and at paragraphs [0032]-[0033] of Kfoury disclose exactly the same thing as Wu in that the input module (200) has left and right rails (418, 416) which engage groove (414) when the input module is inserted into the cavity (402). Wu discloses the key module (112) has two opposite side edges (113) for sliding engagement with opposing guide rails (114) formed in an inward rim (115) of the bay (111). When the opposite side edges (113) and opposing guide rails (114) of Wu are compared with the left and right rails (418, 416) and groove (414) of Kfoury it is clear that these features are identical. In both Wu and Kfoury the rails and grooves allow for the input module (200) / key module (112) to be slid into the keycap bay (111) / cavity (402) from a side of the device and nothing more. There is absolutely no disclosure whatsoever that the opposite side edges (113) and opposing guide rails (114) of Wu or the left and right rails (418, 416) and groove (414) of Kfoury "are arranged in direct connection to one or more of said plurality of lips" as recited in Applicant's claim 3.

Therefore, claim 3 is patentable over the combination of Wu and Kfoury because their combination does not disclose or suggest that the guiding pieces are arranged in direct connection to one or more of said plurality of lips as recited in Applicant's claim 3. Claims 8 and 13 are patentable over the combination of Wu and Kfoury for reasons that are substantially similar to those described above with respect to claim 3.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

  
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